

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

vs.

KEVIN JETER,
Defendant.

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No. 7:23-cr-00883-DCC-12

NOTICE OF ELECTION OF RECIPROCAL DISCOVERY

Comes now Defendant Kevin Jeter and, pursuant to Fed. R. Crim. Pro. 16, notifies the Government and the Court that he has elected into reciprocal to the fullest extent permitted under the rules, including but not limited to the following:

1. The Defendant's oral statements, if any
2. The Defendant's written or recorded statements, if any
3. The Defendant's prior criminal record, if any
4. The Government's expert witnesses, their CVs, and their findings and conclusions
5. Tangible items, including:
 - a. 911 calls
 - b. Police / law enforcement reports
 - c. Alleged contraband seized
 - d. Video and audio recordings
 - e. Cell phones and computers
 - f. GPS records
 - g. Pen / toll registers

- h. Search warrants, including affidavits
 - i. Witness statements
 - j. Plea agreement with witnesses
 - k. Criminal records of witnesses
 - l. Evidence sought to be admitted under Fed. R. Evid. 404(b)
6. All potentially exculpatory information under *Brady v. Maryland*, 373 U.S. 83 (1963) and impeachment material under *Giglio v. United States*, 405 U.S. 150 (1972).

Dated: May 9, 2024

Respectfully submitted,

KEVIN JETER

s/Howard W. Anderson III

Howard W. Anderson III

D.S.C. Bar #11456

TRULUCK THOMASON LLC
3 Boyce Ave
Greenville, SC 29601
864-331-1751
howard@truluckthomason.com

CERTIFICATE OF SERVICE

I, Howard W. Anderson III, certify that I filed a copy of the foregoing paper using the Court's CM/ECF system, which will deliver a copy to all counsel of record except for the following, whom I have this day served by U.S. Mail:

n/a

s/Howard W. Anderson III

Howard W. Anderson III

D.S.C. Bar #11456